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2008 SEP 15 PM 12:56
CHAIRMAN'S
CORRESPONDENCE UNIT

September 3, 2008

Chairman Christopher Cox
SEC Headquarters
100 F Street, NE
Washington, DC 20549

RE: SEC Proposed Ruling SEC 151A

Dear Chairman Cox:

I am writing you to urge your support by opposing the U.S. Securities and Exchange Commission Proposed Ruling 151A which calls for jurisdiction over indexed annuity regulation by redefining them as securities.

I am a California business owner with ING Financial Partners with both insurance and securities licenses and I strongly support treating indexed annuities as insurance products and not redefining indexed annuities as securities. Clearly indexed annuities are not mutual funds and variables and there are already regulations in place that are in the best interest of the customer. The insurance companies should be the ones at risk, but with this proposed ruling, the customers would be at risk which is disconcerting to me as an Investment Advisor.

I again urge you to oppose the Proposed Ruling SEC 151A.

Regards,



Craig C. Rumbaugh, MBA

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